

FILED

FEB 20 2003

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

01C 9678**HON. REPRESENTATIVE SYLVESTER HENDRICKS,****PLAINTIFF,***Plaintiff Demands Trial By Jury***VS.**

**JUDGE ZAGEL Designated
MAGISTRATE JUDGE MASON**

CHICAGO BOARD OF EDUCATION AND OR THEIR AGENT'S eg:**CHICAGO SCHOOL REFORM BOARD OF TRUSTEES MEMBERS,****PAUL REVERE ELEMENTARY SCHOOL (LOCAL SCHOOL COUNCILS),****DR. RICHARD STEVENS, MR. PAUL VALLAS, MR. DEAN GUSTAFSON,****DR. RUDOLPH ANDERSON and MR. SHELBY TAYLOR, a body politic and****corporate, in their official and individual capacities, AND OR THEIR AGENTS, et al.****City of Chicago, County of Cook and State of Illinois****DOCKETED**

FEB 25 2003

DEFENDANT,

**AMENDED / ADDENDUM
CIVIL RIGHTS COMPLAINT
(COLLATERAL CONSPIRACY)**

Now comes Plaintiff, the HONORABLE L.S.C. REPRESENTATIVE SYLVESTER HENDRICKS, by and though PRO-SE, complain that Defendants, CHICAGO BOARD OF EDUCATION / CHICAGO SCHOOL REFORM BOARD OF TRUSTEES MEMBERS AND OR THEIR AGENT'S, eg: DR. RICHARD STEVENS, MR. PAUL VALLAS, MR. DEAN GUSTAFSON, DR. RUDOLPH ANDERSON and MR. SHELBY TAYLOR, / PAUL REVERE ELEMENTARY SCHOOL, LOCAL SCHOOL COUNCILS a body politic and corporate, in their official and individual capacities, City of Chicago, County of Cook and State of Illinois, THAT STARTING IN SEPT1992 AND CONTINUALLY 2002, THE CHICAGO BOARD OF EDUCATION AND OR THEIR AGENT'S, eg: SUPERINTENDENT, DISTRICT SUPERINTENDENT, THE BOARD PRESIDENT, CHIEF EXECUTIVE OFFICER, REGIONAL EXECUTIVE OFFICER, PAUL REVERE ELEMENTARY & HIRSCH METROPOLITAN HIGH LOCAL SCHOOL COUNCIL'S REPRESENTATIVES & PRINCIPAL'S, AND OR THEIR AGENT'S, eg: TEACHER'S, PARENT'S, THE CHICAGO POLICE DEPARTMENT AND THE COOK COUNTY COURT SYSTEM. HAVING EITHER KNOWING OR UNKNOWING VIOLATING FEDERAL, STATE AND LOCAL LAWS, IN VIOLATING THE CIVIL RIGHTS AND STATUTORY DUTIES. WITH LIBELOUS ASSERTIONS AND SLANDER. THESE REMARKS HAVING RESULTED IN ACTIONS WHICH HAVE PROHIBITED AND OR ABRIDGED MOST ALL OF THE FOLLOWING, CONSTITUTIONAL RIGHTS AND STATE LAWS WHICH PLACED THE LIFE, HEALTH AND SAFETY OF THE CHILDREN AND THEIR SENIOR ELECTED (1991- 2000) Local School Council COMMUNITY REPRESENTATIVE, the HONORABLE SYLVESTER HENDRICKS, in JEOPARDY.

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BA. From, (1991-2003) *all* times relevant hereto, the defendant, **Chicago Board of Education / CHICAGO SCHOOL REFORM BOARD OF TRUSTEES MEMBERS**, Pursuant to (105 ILCS 5/34-1) serving as the governing board of the school district, with final policy-making authority, were / a body politic and corporate, charged with the operation and administration of the **CHICAGO PUBLIC SCHOOLS, DISTRICT 299**, in the city of Chicago, the County of Cook, the State of Illinois and the United States of America.

was fully apprise, aware and informed by the **HONORABLE REP. SYLVESTER HENDRICKS** and **THEIR AGENT'S**, eg:

PAUL REVERE ELEMENTARY SCHOOL (LOCAL SCHOOL COUNCILS), DR. RICHARD STEVENS, MR. PAUL VALLAS, MR. DEAN GUSTAFSON, DR. RUDOLPH ANDERSON and MR. SHELBY TAYLOR, that several Board "policy" and practice were constitutional violation, civil rights violation and violation of state statutes, causing constitutional injury and causing the following deprivation:

First Amendment and Ninth Amendment,

(COUNT ONE) Sec. 241. Conspiracy against Rights, (COUNT TWO) Sec. 242. Deprivation of Rights under Color of Law, (COUNT THREE) Article 5. Public Accommodations, (COUNT FOUR) Article 6. Additional Civil Rights Violations, (COUNT FIVE) INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS, (COUNT SIX) DEFAMATION, (COUNT EIGHT) WHISTLE-BLOWER PROTECTION and (COUNT NINE) VOLUNTEER PROTECTION.

The Defendant, **Chicago Board of Education / CHICAGO SCHOOL REFORM BOARD OF TRUSTEES** knowingly, recklessly / with deliberate indifference and callous disregard for the **HON. REP. SYLVESTER HENDRICKS**, rights did failed to control, discipline, instruct and or supervise, **PAUL REVERE LOCAL SCHOOL COUNCIL, DR.RICHARD STEVENS, MR. PAUL VALLAS, MR. DEAN GUSTAFSON, DR. RUDOLPH ANDERSON and MR. SHELBY TAYLOR**, relative to their refraining from unlawfully and maliciously harassing, having arrest, maliciously prosecution and many other forms of retaliation against the **HONORABLE REP. SYLVESTER HENDRICKS**, *First Amendment of free speech and association.*

THEREFORE, the Plaintiff, the HONORABLE REPRESENTATIVE SYLVESTER HENDRICKS, as the past SENIOR ELECTED Local School Council, COMMUNITY REPRESENTATIVE, of the PAUL REVERE ELEMENTARY SCHOOL 1010 EAST 72nd STREET, *the city of Chicago, the County of Cook, in the State of Illinois and the United States of America*, asks that this HONORABLE COURT, Grant With Prejudice the following relief to the plaintiff:

(INJUNCTIVE RELIEF)

(a) Direct/Order *With Prejudice* the Defendant, Chicago Board of Education, CHICAGO SCHOOL REFORM BOARD OF TRUSTEES, PAUL REVERE LOCAL SCHOOL COUNCIL, DR. RICHARD STEVENS, MR. PAUL VALLAS, MR. DEAN GUSTAFSON, DR. RUDOLPH ANDERSON and MR. SHELBY TAYLOR, a body politic and corporate, in their official and individual capacities, and or THEIR AGENTS, et al. DEFENDANT, to promote, the Plaintiff, HONORABLE REPRESENTATIVE SYLVESTER HENDRICKS, PAST SR. ELECTED L.S.C. COMMUNITY REPRESENTATIVE, PAUL REVERE ELEMENTARY SCHOOL, 1010 EAST 72nd STREET, 1991-1993, 1993-1996, 1996-1998 & 1998-2000, PLAINTIFF, *First Amendment Rights, freedom of speech, the right of peaceably assemble, and to petition for a redress of grievances, under the Constitution of the United States of America and His Statutory Duties: (105 ILCS 5/34-2.3) Sec. 34-2.3 Local School Councils, Powers and Duties under the State of Illinois.*

(b) Direct/Order *With Prejudice* the Defendant, Chicago Board of Education, CHICAGO SCHOOL REFORM BOARD OF TRUSTEES / PAUL REVERE LOCAL SCHOOL COUNCIL, DR. RICHARD STEVENS, MR. PAUL VALLAS, MR. DEAN GUSTAFSON, DR. RUDOLPH ANDERSON and MR. SHELBY TAYLOR, a body politic and corporate, in their official and individual capacities, and or thier AGENTS, et al. DEFENDANT, to in person and in public, deliver a verbal and written apology, to the Plaintiff, the HON. REP. SYLVESTER HENDRICKS, PAST SR. ELECTED L.S.C. COMMUNITY REPRESENTATIVE, of the PAUL REVERE ELEMENTARY SCHOOL, 1010 EAST 72nd STREET, 1991-1993, 1993-1996, 1996-1998 & 1998-2000, and to publish same in All of the City of Chicago Daily Newspapers, All the Chicago Board of Education Publications /Announcements and All Announcements /Publications serving the PAUL REVERE ELEMENTARY SCHOOL and it's Community.

(COMPENSATORY DAMAGES)

(a) Direct/Order *With Prejudice* the Defendant Chicago Board of Education, CHICAGO SCHOOL REFORM BOARD OF TRUSTEES, PAUL REVERE LOCAL SCHOOL COUNCIL, DR. RICHARD STEVENS, MR. PAUL VALLAS, MR. DEAN GUSTAFSON, DR. RUDOLPH ANDERSON and MR. SHELBY TAYLOR, a body politic and corporate, in their official and individual capacities, and or their AGENT'S et al. DEFENDANT, To make satisfactory payment / reparation of \$100.00 per. day to, the HONORABLE REP. SYLVESTER HENDRICKS, PAST SR. ELECTED L.S.C. COMMUNITY REPRESENTATIVE, of PAUL REVERE ELEMENTARY SCHOOL, 1010 EAST 72nd STREET, 1991-1993, 1993-1996, 1996-1998 & 1998-2000; Recompense / reimburse: the HON. REPRESENTATIVE SYLVESTER HENDRICKS, PAST SR. ELECTED L.S.C. COMMUNITY REPRESENTATIVE, of PAUL REVERE ELEMENTARY SCHOOL, 1010 EAST 72nd STREET, 1991-1993, 1993-1996, 1996-1998 & 1998-2000, \$100.00 per. day compensation for the time he, the HONORABLE REP. SYLVESTER HENDRICKS, while severing in his Statuary Office as an, Elected Official; while in the Judicial System, Confinement, Imprisonment, Incarceration, House Assess and or Lock up's, of the Chicago Police Dept, Cook County Sheriff Dept and the Cook County Court System.

(PUNITIVE DAMAGES)

(a) Direct/Order *With Prejudice* the Defendant, CHICAGO SCHOOL REFORM BOARD OF TRUSTEES MEMBERS, PAUL REVERE LOCAL SCHOOL COUNCIL, DR. RICHARD STEVENS, MR. PAUL VALLAS, MR. DEAN GUSTAFSON, DR. RUDOLPH ANDERSON and MR. SHELBY TAYLOR, a body politic and corporate, in their individual capacities, and or their AGENT'S et al. DEFENDANT, to award the HON. REPRESENTATIVE SYLVESTER HENDRICKS, PAST SR. ELECTED L.S.C. COMMUNITY REPRESENTATIVE, of PAUL REVERE ELEMENTARY SCHOOL, 1010 EAST 72nd STREET, 1991-1993, 1993-1996, 1996-1998 & 1998-2000, for emotional pain, suffering, inconvenience, mental anguish, wrongful persecutions and loss of enjoyment of life:

(1) Direct/Order *With Prejudice* the Defendant, MR. DEAN GUSTAFSON, DR. RUDOLPH ANDERSON and MR. SHELBY TAYLOR, to pay \$100,000.00 for each (Count) and Year, of there contracts sever while severing with the HON. REPRESENTATIVE SYLVESTER HENDRICKS, at PAUL REVERE ELEMENTARY SCHOOL, 1010 EAST 72nd STREET, 1991-1993, 1993-1996, 1996-1998 & 1998-2000, for emotional pain, suffering, inconvenience, mental anguish, wrongful persecutions and loss of enjoyment of life:

(2) Direct/Order *With Prejudice* the Defendant, CHICAGO SCHOOL REFORM BOARD OF TRUSTEES MEMBERS, DR. RICHARD STEVENS and MR. PAUL VALLAS, to pay \$200,000.00 for each count and year, of thrc contracts sever while severing with / by, the PLAINTIFF, HON. REPRESENTATIVE SYLVESTER HENDRICKS, ELECTED L.S.C. COMMUNITY REPRESENTATIVE, PAUL REVERE ELEMENTARY SCHOOL 1991-1993, 1993-1996, 1996-1998 & 1998-2000 and HIRSCH METROPOLITAN HIGH SCHOOL 1996-1998, City of Chicago, Cook of Cook State of Illinois and the United States of America, for years severed, for emotional pain, suffering, inconvenience, mental anguish, wrongful persecutions and loss of enjoyment of life:

(OTHER RELIEF)

(a) Direct/Order *With Prejudice* the Defendant, **CHICAGO SCHOOL REFORM BOARD OF TRUSTEES MEMBERS, PAUL REVERE LOCAL SCHOOL COUNCIL, DR. RICHARD STEVENS, MR. PAUL VALLAS, MR. DEAN GUSTAFSON, DR. RUDOLPH ANDERSON and MR. SHELBY TAYLOR**, a body politic and corporate, in their individual capacities, AND OR THEIR AGENT'S et al. DEFENDANT, to award the **HONORABLE REP. SYLVESTER HENDRICKS, PAST SR. ELECTED L.S.C. COMMUNITY REPRESENTATIVE, of PAUL REVERE ELEMENTARY SCHOOL, 1010 EAST 72nd STREET, 1991-1993, 1993-1996, 1996-1998 & 1998-2000**, Cost including reasonable attorney / par legal fees, expert witness fees and grant such other relief of \$20,000,000.00 or as the Jury / Court may fine appropriate.

(b) Direct/Order *With Prejudice*, the Cook County Clerk and the Cook County Sheriff, to expunge any and all Arrest, Confinement, Detainment, House Arrest, Imprisonment, Incarceration, and Lock up's Records, of the Chicago Police Dept. (IR. 119162), Cook County Sheriff Dept. (# 014660993 and other) and the Cook County Court System, of the Honorable **SYLVESTER HENDRICKS, 7218-20 SO. DOBSON AVE., 9212 SO. LAFLIN AVE., in the city of CHICAGO, ILLINOIS, or any other address.**

WHEREFORE:

PLAINTIFF *the HONORABLE SYLVESTER HENDRICKS*, Prays that his COMPLAINT and Directs / Orders be GRANTED With Prejudice, *For this he shall forever PRAY.*



HONORABLE SYLVESTER HENDRICKS

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